

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY  
D.T.E. 02-24/25

SEVENTH SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY TO  
FITCHBURG GAS AND ELECTRIC LIGHT COMPANY

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Fitchburg Gas and Electric Light Company (“Fitchburg” or “Company”) the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

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5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and on all parties; also submit three (3) copies of the responses to Jeanne L. Voveris, Hearing Officer, six (6) copies of the responses to Sean Hanley, Assistant Director - Rates and Revenue Requirements Division and six (6) copies of the responses to Paul Osborne, Assistant Director - Rates and Revenue Requirements Division.
8. In addition to filing, all non-proprietary responses should be submitted by e-mail to [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us) and to the e-mail address of any party required to be served.

INFORMATION REQUESTS

- DTE 7-1      Refer to Sch. MHC-1 (Electric) at 2. Please provide a worksheet, in similar form to the attached, that itemizes Row 1, “Total Sales,” by rate class. The Company’s response should include for each rate class the revenues and cents per kilowatthour (“KWh”) applicable to each of the revenue component columns, and should provide the total revenues and KWh sales for each rate class. The total revenues and KWh sales should correspond to the totals found on page 300 of the Company’s 2001 Annual Return to the Department.
- DTE 7-2      Refer to the Company’s response to Information Request DTE 2-5. Please explain the meaning of the \$68,051 adjustment labeled “Update of Internal Transmission cost of service to 20001 amounts.” Provide the source of that amount.

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- DTE 7-3 Refer to the Company's response to Information Request DTE 2-7. (1) Please explain the reasons for the decrease in sales and demand revenue associated with the Large General Service/Special Contract class from 1999 to 2001; (2) break down the Company's 1999 and 2001 KWh sales by major rate class and reconcile them with the KWh sales reported in the Company's 1999 and 2001 annual returns to the Department; and (3) provide a detailed explanation of how the sales to the contract customer referenced therein create a difference between the sales in this response and those provided in Ms. Asbury's schedules.
- DTE 7-4 Refer to the Company's response to Information Request DTE 2-9. Please provide this response, including sales for resale in the table "Electric Delivery kWh," and reconciling the data with the sales reported in the Company's annual returns to the Department.
- DTE 7-5 Refer to the Company's response to Information Request DTE 2-9. Please provide a table with two columns for the years 1995 through 2001, with one column representing Total Operating Revenues and the other column representing the energy costs. As part of this response, explain how, despite the decrease in KWh sales during 2001, the increase in energy costs during 2001 over 2000 levels results in an increase in operating revenues during 2001.
- DTE 7-6 Refer to the Company's response to Information Request DTE 4-10. With respect to the Pretax Utility Operating Income associated with Energy Efficiency, explain the meaning and justification the application of "earned incentives of \$164,994" and "lost base revenues of \$241,950."
- DTE 7-7 Refer to Exh. JHA-1 at 19 and 21. Please describe the assets booked to Accounts 352 and 361.
- DTE 7-8 Refer to Exh. MHC-9 (Gas). Please provide all workpapers and documents that support the \$26,379 Amortization expense for Organization and the \$138,017 Amortization expense for Miscellaneous Intangible Plant. As part of the Company's response, please describe the items represented in these accounts.
- DTE 7-9 Refer to Exh. MHC-9 (Gas). Please provide all workpapers and documents that support the \$35,770 Amortization expense for Common Plant. As part of the Company's response, please describe the items represented in these accounts.

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- DTE 7-10 Refer to the Company's response to Information Request DTE 1-34. Please provide a copy of the Company's (Gas) annual construction plans for years 1998 through 2001 and provide a copy of the Company's "comprehensive gas distribution planning study" for 2002.
- DTE 7-11 Refer to the Company's response to Information Request DTE 1-35. Please provide the breakdown of costs (shown in Exh. FGE-MHC-3 (Gas) at 3-9) for each project booked under multiple accounts. Describe the basis for such breakdown or allocation.
- DTE 7-12 Refer to the Company's response to Information Request DTE 1-36. Please provide a copy of the Company's "2002 Gas Planning Study."
- DTE 7-13 Refer to Sch. MHC-2 (Gas). Please indicate whether each cost of service entry in the "Total Amount" column should match the corresponding entry shown in the "Total Company" column in Sch. JLH-5-1 (Gas) at 1, 21. If so, please explain any discrepancy in the amount of each entry. If no, please explain why.
- DTE 7-14 Refer to Sch. MHC-2 (Gas) n.1. Please indicate the specific schedule of the allocated cost of service study referred to and explain any discrepancy in the amounts indicated.
- DTE 7-15 Please indicate whether Management Applications Consulting, Inc. performed the allocated cost of service study ("COSS") filed in Berkshire Gas Company, D.T.E. 01-56 (2002). If so, please list each allocator used in the compliance filing COSS approved in D.T.E. 01-56 that was modified in the proposed COSS in the instant docket. For each allocator listed, please describe in detail the changes made and the reasons for such changes.
- DTE 7-16 Please indicate whether the Company performed a separate allocated cost of service study to determine the entries shown under the delivery services column of Sch. JLH-5-4 (Gas). If so, please provide a copy of such a study. If not, please explain how the entries were determined stating the basis for such entries.
- DTE 7-17 Please indicate whether the Company performed a separate allocated cost of service study to determine the entries shown under the total production column of Sch. JLH-5-4 (Gas). If so, please provide a copy of such a study. If not, please explain how the entries were determined stating the basis for such entries.

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- DTE 7-18 Please explain or reconcile the differences between the “Total Company” entries shown in Sch. JLH-5-2 (Gas) (Detail Functional Delivery Class Cost of Service) with the corresponding entries under the “Delivery Service” column in Sch. JLH-5-4 (Gas).
- DTE 7-19 Refer to the testimony of James L Harrison (Gas) at 17. Please describe in detail the “allocators for residual production capacity . . . discussed earlier.”
- DTE 7-20 Refer to the testimony of James L Harrison (Gas) at 19. Please provide supporting studies and calculations, or refer to any documents previously filed in this docket, that show how the Company determined the indicated “replacement cost new for each rate class’s services.”
- DTE 7-21 Refer to Workpapers JLH-5 (Gas) at 207. Please provide supporting schedules, or refer to any documents previously filed in this docket, that show for each rate class how the average cost per meter and the average service cost per customer were determined.
- DTE 7-22 Refer to Workpapers JLH-5 (Gas) at 207. Please explain the reasons why the total number of meters used in the meter section of the schedule differs from the number of customers used in the services section of the schedule. Also, provide the total numbers of “spare” and “inactive” meters, as indicated in n.2, and describe how the totals were allocated among rate classes.
- DTE 7-23 Refer to Sch. JLH-7 (Gas) at 1-2, 6. For each reference to “from COSS” and “Sch JLH-5.” Please identify the specific page of the COSS or schedule cited.
- DTE 7-24 Refer to Sch. MHC-7-21 (Gas). Please provide details of the derivation of the annualized amounts of amortization for each line item on this schedule.
- DTE 7-25 Refer to Sch. MHC-7-21 (Gas). Please explain what factors contributed to the increase in the amortization expense in the test year for each line item on this schedule.
- DTE 7-26 Refer to the Company’s 2000 and 2001 Annual Returns to the Department at 47 (Gas); 323 (Electric). Please itemize and quantify for the years 2000 and 2001 all costs included in Accounts 916, 923, 930 and any other account that includes any costs for Advertising/Promotions expense.

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- DTE 7-27 Refer to the Company's 2001 Annual Return to the Department at 47 (Gas); 322 (Electric). Please explain why Account 913 advertising expenses is recorded at \$0.
- DTE 7-28 Refer to Sch. MHC-7-13 (Gas) line 1; Sch. MHC-7-9 (Electric) line 3. Please explain how the company arrived at the (\$3,781) in and (\$10,786) respectively, in advertising/promotions adjustments. Quantify and itemize every component of this calculation.
- DTE 7-29 Refer to D.T.E. 98-51 at 34. In its last gas rate case the Company proposed to include \$111,300 in gas division advertising expense. Please discuss the reasons why the amount of gas division advertising that the Company proposes to include in cost of service in the present case has decreased.
- DTE 7-30 Refer to the Company's response to Information Request DTE 2-18. Please provide a brief description for each referenced expense.
- DTE 7-31 Refer to the Company's response to Information Request DTE 2-19. Please explain the statement that the Company found it necessary to "journalize some adjustments pertaining to prior period costs" relative to default accounts.
- DTE 7-32 Refer to Sch. MHC 7-18 (Electric). Please provide a brief (i.e., 2 or 3 sentence) description of each of the amortizations referenced, along with the calculations used to derive the annualized amount, the amortization period, and proposed adjustments.
- DTE 7-33 Refer to Sch. KMA-4 (Gas) and the Company's response to Information Request DTE-1-52. Please explain the difference between "Booked Distribution Therm" and "Calculated Distribution Therm Revenue."
- DTE 7-34 Refer to Sch. KMA-4 (Gas). Please explain source of the Billed Therms. Do these values come from actual customers' meter readings?
- DTE 7-35 Refer to Sch. KMA-6 (Gas). Please provide for each rate class the number and percentage of bills with consumption equal to zero therms.
- DTE 7-36 Rates G-41 and G-51 currently have the same volumetric rate. Please discuss the reasons why the Company propose to set different volumetric rates for these rate classes.

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- DTE 7-37      Please provide all data, calculations, workpapers, and assumptions used to determine the non-temperature sensitive sales that were removed from sales volumes.
- DTE 7-38      Refer to the testimony of Karen M. Asbury at 5. Please describe in detail all differences between the MBA method and CGAC tariff approved in D.T.E. 01-56 as compared to the MBA method and CGAC tariff filed in the instant docket.
- DTE 7-39      Refer to Sch. JLH-4, at 2. Please explain why the Company used data from the months November through October as opposed to the calendar test year used to determine the cost of service.
- DTE 7-40      Refer to Sch. JLH-1, at 10; Sch. JLH-4, at 3. Please describe with supporting schedules how the class design-day load and class base-use load on design day were determined.
- DTE 7-41      Refer to the workpapers supporting Sch. JLH-4. Provide schedules supporting the Company's calculation of estimated sendout by class.
- DTE 7-42      Refer Sch. JLH-1, at 9. Please provide schedules supporting the calculation of the average of normal year firm sendout over July and August.
- DTE 7-43      Refer to Sch. JLH-1, at 9-10. Please elaborate with supporting schedules on the statement "[i]n the MBA method, the capacity and commodity costs of gas slated for injection and their associated transportation costs are accumulated and assigned to the winter period."